

**BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
OFFICE OF THE SECRETARY  
WASHINGTON, D.C.**

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Application of )

**AIR TRANSPORT INTERNATIONAL, INC.** )

Docket DOT-OST-2020-0068

for exemption authority under 49 U.S.C. § 40109 )  
(U.S.-Hong Kong all-cargo service) )

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**APPLICATION OF AIR TRANSPORT INTERNATIONAL, INC.  
FOR RENEWAL OF EXEMPTION AUTHORITY**

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INC.**

Dated: March 21, 2022

**NOTICE: Any person who wishes to support or oppose this application must file an answer by April 5, 2022, and serve that answer on the above named counsel and on all persons served with this application.**

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<b>AIR TRANSPORT INTERNATIONAL, INC.</b>	)	Docket DOT-OST-2020-0068
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Pursuant to 49 U.S.C. § 40109 and Subpart C of the Department’s Rules of Practice (14 C.F.R. § 302.301 *et seq.*), Air Transport International, Inc. (“ATI”) hereby applies for renewal of its exemption and route integration authority last granted by Notice of Action Taken, issued June 23, 2020, in the above-referenced docket (“the NOAT”), which authorizes ATI to engage in scheduled foreign air transportation of property and mail between the United States and Hong Kong. ATI requests that the exemption authority be granted for a period of at least two years.

In further support of this application, ATI states as follows:

1. ATI is a Delaware corporation in good standing whose principle place of business is at 145 Hunter Drive, Wilmington, Ohio 45177. ATI is a citizen of the United States as defined in 49 U.S.C. § 40102(a)(15). ATI is a wholly owned subsidiary of Air Transport Services Group, Inc. Its president and at least two-thirds of its directors and other managing officers are citizens of the United States, and at least 75% of its voting stock is held by U.S. citizens.

2. ATI holds a certificate of public convenience and necessity authorizing it to engage in interstate scheduled air transportation of persons, property and mail, and a blanket all-cargo open-skies certificate.<sup>1</sup> *See* Order 2013-2-1. ATI also holds certificates of public convenience and necessity authorizing it to engage in interstate and foreign charter air transportation of persons, property and mail. *See* Order 2013-3-2. ATI currently operates domestic and international passenger and cargo flights under these certificates.

3. ATI continues to be fit, willing and able to provide the proposed services and to conform to the provisions of the federal transportation statute and the rules, regulations and requirements of the Department thereunder. To the extent necessary, ATI requests the Department to take official notice pursuant to 14 C.F.R. § 302.24 of the data on file at the Department that establishes its fitness to operate the services at issue.

4. ATI hereby requests the renewal of its exemption authority permitting it to engage in scheduled foreign air transportation of property and mail between a point or points in the United States and Hong Kong. As noted in the Department's above-referenced Notice of Action Taken in this docket, the exemption and integration authority requested herein is consistent with the scheduled all-cargo route authority for U.S. carriers described in the 2002 United States-Hong Kong Memorandum of Understanding regarding bilateral air services between the two countries and relevant appendices, agreed records and notes relevant to and incorporated into the same.

5. Moreover, grant of this application is clearly in the public interest as it will maintain competitive conditions in the all-cargo operations offered by U.S. carriers in these markets to the benefit of the shipping public.

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<sup>1</sup> ATI's authority to conduct scheduled passenger flight operations is not yet effective.

6. The grant of this application will not result in a near-term net annual increase in fuel consumption of 10 million gallons or more. Thus, this request is not a major regulatory action requiring an energy statement under 14 C.F.R. Part 313.

7. ATI hereby expressly relies on the provisions of 5 U.S.C. § 558(c) and Part 377 of the Department's Special Regulations to continue its exemption authority in force pending final Department action on this renewal application. This application is being filed on a timely basis in accordance with the provisions of section 377.10(c) of the Department's Special Regulations.

WHEREFORE, Air Transport International, Inc. respectfully requests that the Department of Transportation: (1) renew its exemption authorizing it to engage in scheduled foreign air transportation of property and mail between the United States and Hong Kong; and (2) grant such other further and relief as the Department may deem appropriate.

Respectfully submitted,

SILVERBERG GOLDMAN, PLLC

Attorneys for  
**AIR TRANSPORT INTERNATIONAL, INC.**

/s/  
G. Bailey Leopard, Jr.

Dated: March 21, 2022

### **CERTIFICATE OF SERVICE**

I hereby certify that I have, on this 21<sup>st</sup> day of March 2022, served a copy of the foregoing Application of Air Transport International, Inc. for Renewal of Exemption Authority by e-mail upon the following:

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